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P.A.

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Attorneys for Secured Creditor

10-04619

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF ARIZONA**

IN RE:

Fred Ramirez and Norma Ramirez

Debtors.

HomeAmerican Mortgage Corporation

Secured Creditor,

vs.

Fred Ramirez and Norma Ramirez, Debtors;  
Edward J. Maney, Trustee.

Respondents.

No. 2:10-bk-02500-CGC

Chapter 13

**OBJECTION TO CHAPTER 13 PLAN**

HomeAmerican Mortgage Corporation, a secured creditor, by its attorneys, TIFFANY & BOSCO, P.A., hereby objects to the proposed Chapter 13 Plan filed by the Debtor for the following reasons:

1. The Chapter 13 Plan does not adequately provide for repayment of arrearages owed to HomeAmerican Mortgage Corporation, pursuant to the proof of claim in the amount of \$17,618.10. Secured creditor requests that the arrearages as set forth in its Proof of Claim be paid through the Plan. A

1 copy of Secured Creditor's Proof of Claim is attached hereto as Exhibit "A" and made a part hereof by this  
2 reference.

3 2. The Chapter 13 Plan filed with the Court does not provide to secured creditor repayment of  
4 its attorney fees incurred for bankruptcy and/or foreclosure proceedings. Secured creditor requests that the  
5 attorney fees as set forth in its Proof of Claim be paid through the Plan.

6 Secured Creditor will withdraw these objections when presented with a Stipulated Order  
7 Confirming Plan that provides for the arrearages, interest and fees as provided in the Proof of Claim and as  
8 stated above.

9 DATED this 23rd day of February, 2010.

10 Respectfully submitted,

11 TIFFANY & BOSCO, P.A.

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13  
14 BY /s/ MSB # 010167

15 Mark S. Bosco

Leonard J. McDonald

Attorneys for Secured Creditor

16 COPY of the foregoing mailed  
17 February 23, 2010 to:

18 Fred Ramirez and Norma Ramirez  
19 10109 W. Preston Lane  
20 Tolleson, AZ 85353  
Debtors

21 Joseph W. Charles  
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Attorney for Debtors

23 Edward J. Maney  
24 P.O. Box 10434  
25 Phoenix, AZ 85064-0434  
Trustee

26 By: Julie Bush

